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In the Supreme Court of the United States

OCTOBER TERM, 1973

No. 73-1526

COSMO CANGIANO, PETITIONER

v.

UNITED STATES OF AMERICA

No. 73-6472

ELANA MARIE ISOLA, PETITIONER

v.

UNITED STATES OF AMERICA

ON PETITIONS FOR WRITS OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT

BRIEF FOR THE UNITED STATES IN OPPOSITION

OPINION BELOW

The opinion of the court of appeals is reported at 491 F. 2d 906.

JURISDICTION

The judgment of the court of appeals was entered on January 11, 1974. Petitioner Cangiano's petition for rehearing was denied on March 12, 1974. Petitioner

Isola's petition for rehearing was denied on March 1, 1974. The petition for a writ of certiorari was filed on April 11, 1974, in No. 73–1526, and on March 27, 1974, in No. 73–6472. The jurisdiction of this Court is invoked under 28 U.S.C. 1254(1).

QUESTIONS PRESENTED

1. Whether search warrants for obscene materials and the subsequent seizure of those materials violated the First and Fourth Amendments, because

(a) there was no probable cause for the issuance of the warrants;

(b) it was necessary to hold an adversary hearing prior to issuing the warrants;

(c) the warrants and the seizures made pursuant to them were overly broad; or

(d) the seizures were illegal because, due to inadvertence, no return was made on the warrants until 27 days after their issuance.

2. Whether the government failed to prove, and the court failed to charge the jury that it must find, that petitioners had a specific intent to distribute the obscene materials in interstate commerce.

3. Whether 18 U.S.C. 1465 as applied in this case is unconstitutionally vague.

STATEMENT

Following a jury trial in the United States District Court for the Eastern District of New York, petitioners were convicted of conspiring to transport in interstate commerce for the purpose of sale and distribution obscene motion picture films, pictures, books

and pamphlets, in violation of 18 U.S.C. 371 (Count I),[1] and transporting from Staten Island, New York, to New Jersey some "ninety reels of obscene, lewd, lascivious, and filthy * * * films, for the purpose of the sale and distribution therein," in violation of 18 U.S.C. 1465 (Count II). Petitioner Cangiano was sentenced to concurrent terms of three years' imprisonment and was fined $5,000 on each count. Petitioner Isola was sentenced to concurrent terms of three years' imprisonment on each count. The court of appeals affirmed (Pet. Apps.).

The facts of the case are set forth in the opinion of the court of appeals (Cangiano Pet. App.[2] 1a–18a). After having been told by a reliable informant that petitioner Cangiano had moved part of his pornography operation from Brooklyn (see *Cangiano I*)[3] to Staten Island, F.B.I. agents commenced a four-month surveillance which included three locations named by the informant. The informant also told the agents that Cangiano was storing large quantities of pornographic materials in petitioner Isola's Forest Avenue apartment and in cars parked in the vicinity, including one registered in Isola's name, as well as his own car.

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[1] In addition to petitioners, Count I charged Anthony Palumbo and Anthony Mascola as defendants and Gerardo Miele as an unindicted co-conspirator. Mascola's trial was severed and the charge was dismissed on the government's motion. Palumbo was convicted but did not appeal.

[2] Hereinafter referred to as "Pet. App."

[3] *United States* v. *Cangiano*, 464 F. 2d 320 (C.A. 2), vacated and remanded, 413 U.S. 913, affirmed on reconsideration, 491 F. 2d 905 (C.A. 2), pending on petition for certiorari, No. 73-1076.

Another reliable informant told the F.B.I. that Cangiano was similarly using a basement at Gordon Street for storage of pornographic material. The informant described the Helena Pillow Company at Victory Boulevard as the sales office of the business. One of the informants gave the agents four reels of film, one deck of playing cards, and six magazines called "Wife Swapping," all of which were obtained from Cangiano and all of which described or depicted men and women engaged in natural and unnatural sex acts.

On November 11, 1969, the agents saw a sale at the Victory Boulevard address involving a co-conspirator, Miele, who was driving a car with New Jersey license plates. The agents followed him into New Jersey where they arrested him and searched his car. In the car they found a carton of 100 eight mm. "stag films," which Miele admitted he had purchased from Cangiano.[4] They screened one film for a United States Commissioner, and F.B.I. Agent Monaghan, who was in charge of the investigation, also gave the Commissioner an affidavit (C.A. App.[5] G) detailing the information received from the informants and the results of the surveillance.

On November 12 the Commissioner issued three warrants to search the three Staten Island locations described on Forest Avenue, Gordon Street, and Victory Boulevard. The warrants (C.A. Apps. D. E, F) directed the agents to seize:

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[4] This incident formed the basis for Count II.

[5] "C.A. App." refers to petitioners' appendix in the court of appeals.

> a quantity of playing cards, films, and magazines and books, depicting obscene and lascivious pictures, constituting hard core pornographic material, which pictures portray men and women in the natural and unnatural sexual acts and which playing cards, films, magazines and books are being used to conduct a business of transporting, selling and distributing obscene, lewd, and hard core pornographic pictures in interstate commerce which are in violation of Title 18, United States Code, Section 1465 and 2.

On that day, the search of the Forest Avenue location yielded several cartons and bags of pornographic materials, a spiral notebook, fraudulent New York and New Jersey car registrations, and fraudulent social security cards (C.A. App. D). The search of the Gordon Street location yielded 66 cartons of pornographic materials (C.A. App. E).[6] Isola's car was searched pursuant to a New York City warrant (C.A. Apps. J, K) and yielded 400 reels of pornographic films. All of the obscene material was admitted into evidence, and seven films were screened for the jury.

At trial an expert witness testified that the handwriting in an address book seized from Cangiano incidental to his arrest was substantially the same as the handwriting on the records seized from Isola's

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[6] An appointment book (C.A. App. F) seized at the Helena Pillow Corp. on Victory Boulevard was not introduced at trial.

apartment (Tr. 554–555). These records indicated sales of materials to customers who resided outside of New York.

Gerardo Miele testified that he had purchased pornographic films from Cangiano some two years prior to the events of this case (Tr. 291, 298, 301–303) and that on November 11, 1969, he placed a telephone call to the number at which he had reached Cangiano two years before and told Cangiano that he wished to purchase some "films." Cangiano told him to be at the Helena Pillow Corp. address at 8 p.m. (Tr. 290–293, 332). At the designated time, Miele met Cangiano at the premises and stated that he wished to purchase 100 reels of film. Miele received a carton of films, paid Cangiano about $200, and then departed (Tr. 297, 368–373). It was these films which the F.B.I. agents seized after Miele crossed the bridge into New Jersey (Tr. 313, 350–351).

ARGUMENT

1. Both petitioners challenge the warrants authorizing the seizure of the obscene materials as well as the seizure of the materials. Petitioner Cangiano asserts that the warrants and seizures were invalid because: (1) the magistrate failed to "focus searchingly" on the question of obscenity prior to issuing the warrants, and the interstate element of the offense was not sufficiently established to support the issuance of the warrants, (2) there was no adversary hearing before the warrants issued, (3) the warrants and the seizures were overly broad, and (4) no return was made on the

warrants for 27 days. Petitioner Isola contends that the seizure in her apartment was invalid because there was no examination of the materials by the magistrate prior to issuance of the warrant.

Since neither petitioner was present at or had a possessory interest in the Gordon Street address, where the bulk of the materials was found, and the charges did not involve possession of the materials seized as an element of the offenses (see *Brown* v. *United States*, 411 U.S. 223, 229), petitioners lacked standing to complain of that search and seizure. *Alderman* v. *United States*, 394 U.S. 165, 171–175. Only petitioner Isola had standing to complain of the search of her apartment at 769 Forest Avenue.[7]

A. The magistrate had a sufficient basis to find probable cause that petitioners were engaged in a hard-core pornographic operation. The affidavit in support of the warrant (C.A. App. G), together with the film seized from Miele which was screened for the magistrate before he issued the warrants, established such cause.

Under the circumstances, there was not the same need for the magistrate, as in *Heller* v. *New York*, 413 U.S. 483, and other cases relied on by petitioners,

[7] The materials introduced at trial from Isola's apartment (Tr. 233-238) were a brown bag containing copies of a magazine, "Wife Swapping" (G. Ex. 4B), and a box containing 31 reels of film (G. Ex. 4A). There was, however, other substantial evidence to connect petitioner Isola to the offense charge (*e.g.*, G. Exs. 109-112).

to "focus searchingly on the question of obscenity" in regard to the specific items to be seized. *Id.* at 489. The instant case, unlike *Heller*, involved no violation of the public's right of access to materials arguably within the protection of the First Amendment. Indeed, was "strictly an underground operation in hardcore rials. As the court of appeals noted, their business was "stritly an underground operation in hardcore pornography with clandestine storage facilities not intended to be available to the public, but only to its trusted customers. The 'setting' then is hardly such as to presumptively invoke First Amendment protection" (Pet. App. 13a). Moreover, a thorough review of all the materials prior to authorization of their seizure was not feasible here, as it was in *Heller*, since the police had no public access to obtain the materials for such pre-seizure review by the magistrate.

The affidavit of F.B.I. Agent Monaghan established a sufficient connection with interstate commerce to justify the magistrate's conclusion that there were probable violations of 18 U.S.C. 1465. Monaghan stated in the affidavit that he and other agents observed codefendant Palumbo carry a carton from the Helena Pillow Company and place it in Miele's car, which bore a New Jersey license plate. The agents followed Miele's car into New Jersey where they arrested Miele and his passenger and seized the carton (G. Ex. 1). The affidavit also recited that (C.A. App. G, at 7):

> On November 4, 1969, agents of the Federal Bureau of Investigation observed a U-Haul van parked in the rear garage at 1741 Victory Boulevard where several large cartons * * * were loaded on to the van. The Van, Indiana registration 2939RC left the vicinity followed by the late model Buick registration 7321KD, New York. The Van and Buick parked on front of 307 Gordon Street where several white males were observed in the area of the ground floor of the semi-basement and go to the Van. The driver of the Van and Buick and one other were observed to carry six to eight 1′ x 1′ x 1′ cartons and load them onto a Van, they then left.

This information justified the magistrate's determination that there was a "substantial basis" (*Jones* v. *United States*, 362 U.S. 257, 271) for belief that the materials recited in the affidavit were possessed for sale and transportation in interstate commerce.

B. It also follows that a pre-seizure adversary hearing was neither required nor practicable. Indeed, the affidavit noted that petitioners had transferred their underground pornographic operation, and an adversary hearing would have put them on notice that seizure was imminent, thereby allowing them to evade the search and seizure by again moving the operation. Cf. *Calero-Toledo* v. *Pearson Yacht Leasing Co.*, No. 73-157, decided May 15, 1974, slip op. pp. 15-16. Moreover, petitioners were not thwarted in any effort to obtain "a prompt [post-seizure] judicial determination of the obscenity issue in an adversary proceeding * * *." *Heller* v. *New York*, *supra*, 413 U.S. at 491.

This case stands on an entirely different footing from *Heller* v. *New York*, *supra*, and *Roaden* v. *Kentucky*, 413 U.S. 496, on which petitioners rely. In *Heller*, this Court upheld a seizure, pursuant to a search warrant, of film from a theater, where only a copy of the film was detained in order to preserve it as evidence, and there was no showing that the seizure of the copy precluded continued exhibition of the film. 413 U.S. at 490. While the Court adhered to the ruling in *A Quantity of Books* v. *Kansas*, 378 U.S. 205, that there must be a prior judicial determination of obscenity in an adversary proceeding before allegedly obscene materials may be seized for destruction (413 U.S. at 491), it found the situation in *Heller* to be totally different. Noting that the "Court has never held, or even implied, that there is an absolute First * * * Amendment right to a prior adversary hearing applicable to all cases where allegedly obscene material is seized" (413 U.S. at 488), the Court stressed that "seizing films to destroy them or to block their distribution or exhibition is a very different matter from seizing a single copy of a film for the *bona fide* purpose of preserving it as evidence in a criminal proceeding." 413 U.S. at 492.

In *Roaden*, a film being exhibited to the general public was seized by a sheriff incidental to the warrantless arrest of the theater manager after the sheriff had viewed the film in the theater. This Court invalidated the seizure because, when viewed in the light of the First Amendment, it was unreasonable under the Fourth Amendment. As the Court there stated its rationale (413 U.S. at 503–504):

> The common thread of *Marcus, A Quantity of Books*, and *Lee Art Theatre* is to be found in the nature of the materials seized and the setting in which they were taken. * * * In each case the material seized fell arguably within First Amendment protection, and the taking brought to an abrupt halt an orderly and presumptively legitimate distribution or exhibition. Seizing a film then being exhibited to the general public presents essentially the same restraint on expression as the seizure of all the books in a bookstore. Such precipitate action by a police officer, without the authority of a constitutionally sufficient warrant, is plainly a form of prior restraint and is, in those circumstances, unreasonable under Fourth Amendment standards. The seizure is unreasonable, not simply because it would have been easy to secure a warrant, but rather because prior restraint of the right of expression, whether by books or films, calls for a higher hurdle in the evaluation of reasonableness. The setting of the bookstore or the commercial theater, each presumptively under the protection of the First Amendment, invokes such Fourth Amendment warrant requirements because we examine what is "unreasonable" in the light of the values of freedom of expression.

In the instant case, even assuming that there were "massive seizures," there was no showing that the materials were on the "threshold of dissemination." *Mishkin* v. *New York*, 383 U.S. 502, 513; see *Heller, supra*, 413 U.S. at 492, n. 8. Thus here the seizures did not block public "distribution or exhibition" (*id.* at 492) and were not tantamount to the seizure "of all

the books in a bookstore." *Roaden, supra*, 413 U.S. at 504. Accordingly, no cognizable First Amendment interest was involved requiring a prior adversary hearing.

C. Nor were the search warrants overly broad on their face. Here the material to be seized was identified as (1) "playing cards, films, and magazines and books" that (2) depict "obscene and lascivious pictures, constituting hardcore pornographic material," in that (3) they "portray men and women in the natural and unnatural sexual acts." This language gave an officer executing the warrant adequate guidance in identifying the property to be seized. Materials that did not show men and women in sexual acts would not be seized under the warrants even though they might be obscene because of their portrayal of other proscribable subject matter.

The warrants in this case were not, as petitioners argue, general warrants to seize personal property. "Specificity" does not require the listing of exact titles of all publications that might be found. "The place to be searched and the items to be seized were as precisely identified in the warrant as the nature of the activity permitted. When circumstances make an exact description of instrumentalities a virtual impossibility, the searching officer can only be expected to describe the generic class of items he is seeking." *James* v. *United States*, 416 F. 2d 467, 473 (C.A. 5), certiorari denied, 397 U.S. 907; *Spinelli* v. *United States*, 382 F. 2d 871, 886 (C.A. 8), reversed on other grounds, 393 U.S. 410. Moreover, petitioners have

never contended that the materials seized do not fit the description in the warrants (Pet. App. 14a, 15a).

D. The 27-day delay in making a return on the warrant[*] did not call for suppression of the seized materials. The requirement of prompt review of seized materials set forth in *Heller, supra*, 413 U.S. at 492, upon which petitioner Cangiano relies (Pet. 30), applies only to situations involving disruption of public access to materials and a request for a prompt hearing, and neither occurred here.

Nor did the 27-day delay in the return violate the requirement of Rule 41(d), Fed. R. Crim. P., which provided in 1969 (when the search and seizure occurred) that "[t]he warrant may be executed and returned only within 10 days after its date." This 10-day requirement in effect prior to 1972 actually applied, however, to the execution of the warrant and not to the return, which Rule 41(d) specifically provided need only be made "promptly." Moreover, the return is considered to be merely a ministerial act, so that a delay or defect in the return does not invalidate execution of the warrant. *Evans* v. *United States*, 242 F. 2d 534, 535 (C.A. 6), certiorari denied, 353 U.S. 976; *Benton* v. *United States*, 70 F. 2d 24, 26 (C.A. 4), certiorari denied, 292 U.S. 642; *Rose* v. *United States*, 274 Fed. 245, 250–251 (C.A. 6), certiorari denied, 257 U.S. 655. In any event, no prejudice was shown from the delay here, and, because of the 1972 amendments to Rule

[*] The return was, in the prosecutor's words, "just overlooked" (Tr. 30).

41(d), the question is not of sufficient continuing importance to warrant review.[3]

2. Petitioner Cangiano also asserts (Pet. 21-28) that the government was required to prove, and the court was required to charge that the jury must find, that petitioner had a specific intent to distribute the obscene material in interstate commerce. Petitioner Isola similarly contends (Pet. 9) that the government failed to establish that the use of interstate commerce was an integral part of the scheme to sell or distribute, a requirement said to be imposed by this Court's decision in *United States* v. *Maze*, No. 72-1168, decided January 8, 1974.

Petitioner Cangiano's records of sales (G. Ex. 90F) show substantial sales to persons in Pittsburgh, Detroit, Ohio, Boston, Connecticut, Rhode Island, New Jersey, Maryland, North Carolina, Georgia, Nevada, and California. Likewise, the large volume of sales involved here demonstrated that petitioners contemplated interstate sales. Cf. *United States* v. *Cappello*, 327 F. 2d 378, 379 (C.A. 2). Moreover, Miele testified that he drove from New Jersey to Staten Island to make his purchase from Cangiano and that the films

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[3] As amended effective October 1, 1972, the language in Rule 41(d) calling for execution and return within 10 days has been eliminated, and Rule 41(c) now provides that the warrant "shall command the officer to search, within a specified period of time not to exceed 10 days, the person or place named for the property specified." Rule 41(d) states now, as before, that "[t]he return shall be made promptly and shall be accompanied by a written inventory * * *." The Advisory Committee notes state that the change in Rule 41(c) was intended only to resolve an ambiguity between subsection (c), requiring execution "forthwith," and subsection (d), requiring execution "within 10 days."

he purchased were carried by codefendant Palumbo (Tr. 2500–2505) to Miele's car, which bore a New Jersey license plate. This evidence was sufficient to establish an interstate nexus for the substantive coun..

The reliance upon *United States* v. *Maze, supra,* is misplaced. There the Court construed a significantly different statute, the Mail Fraud Act (18 U.S.C. 1341), which specifically requires that the use of the mails be for the purpose of executing a fraudulent scheme, and the applicability of which does not in terms depend upon any interstate movement. Cf. *Pereira* v. *United States,* 347 U.S. 1, 8–9.

In any event, the evidence sufficiently established that petitioners "knowingly [transported or caused to be transported obscene materials] * * * in interstate * * * commerce for the purpose of sale or distribution * * *" (18 U.S.C. 1465), and that use of interstate commerce was an element upon which the success of the transaction depended. Any requirements imposed by analogy to *Maze* were thus satisfied.

With respect to the conspiracy count, the court charged that the jury must find that each defendant knowingly joined the conspiracy knowing its purpose (C.A. App. C, at 953–960). With respect to the element of knowledge of the use of interstate commerce as part of the conspiracy, the court charged (C.A. App. C, at 960–961):

> The government must prove beyond a reasonable doubt that the defendant entered into the conspiracy charged knowing that it was formed to transport obscene, lewd, lascivious

> and filthy material in interstate commerce and for the purpose of sale and distribution.
>
> The government must prove beyond a reasonable doubt that the accused knew or could reasonably foresee that the business would use interstate facilities.
>
> It's not necessary for the government to prove that the parties discussed interstate facilities or the distribution through interstate facilities.
>
> If the government, through the evidence—if you have concluded that the business of the conspiracy normally would have contemplated at least for a substantial part of its business the use of interstate facilities, then the element is satisfied.

The court of appeals concluded that this charge was erroneous because, while it may have required the same finding of specific intent required for violation of the substantive statute, it permitted that element to be established by reasonable foreseeability as well as by actual knowledge (Pet. App. 6a–8a). However, the court also found this error to be harmless because if petitioners "were engaged in any conspiracy at all, [they] had to actually know that interstate commerce was involved" (Pet. App. 8a). Therefore, the charge given here—that the jury would have to find petitioners "could reasonably foresee" that interstate commerce would be involved—did not constitute reversible error. See *United States* v. *Thompson*, 476 F. 2d 1196, 1198–1200 (C.A. 7), certiorari denied, 414 U.S. 918; cf. *United States* v. *Iacovetti*, 466 F. 2d 1147, 1153–

1154 (C.A. 5), certiorari denied, 410 U.S. 908; *United States* v. *Cimini*, 427 F. 2d 129, 130 (C.A. 6), certiorari denied, 400 U.S. 911; *Nassif* v. *United States*, 370 F. 2d 147, 152-153 (C.A. 8). See also *Anderson* v. *United States*, No. 73-346, decided June 3, 1974, slip op. 15-16.

Accordingly, the court's ruling involves only a narrow application of the harmless error rule to the facts of this case. It does not turn upon the issue presently before this Court in *United States* v. *Feola*, No. 73-1123, certiorari granted April 15, 1974, *i.e.*, whether knowledge of a jurisdictional element must be shown in a conspiracy prosecution when such knowledge need not be shown in a prosecution for the underlying substantive offense, and there is no reason for the Court to defer disposition in this case pending the decision in *Feola*.

3. Finally, although the obscene nature of the materials was never contested below (Pet. App. 15a), and the court of appeals' review of the evidence indicated it was "so patently offensive that it would be obscene in any community including its zoological gardens" (*ibid.*), petitioners contend that 18 U.S.C. 1465, as applied in this case, is unconstitutionally vague. The trial judge charged the jury in regard to the obscenity issue in substantially the same language he employed in *Cangiano I*, *supra*, petition for certiorari pending, No. 73-1076. As we noted in our brief in opposition in that case, petitioners' contention is similar to one of the issues raised in *Hamling* v. *United States*, No. 73-507, argued April 15, 1974.

CONCLUSION

The Court should defer disposition of these petitions pending the decision in *Hamling*.

Respectfully submitted.

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